



CALIFORNIA BUILDING CODE (2006 IBC) PUBLIC PROPOSAL FORM

PLEASE SEE REVERSE FOR INSTRUCTIONS ON SUBMITTING PUBLIC PROPOSALS. PROPOSALS MUST COMPLY WITH THESE INSTRUCTIONS.

- 1) Indicate the format in which you would like to receive your Public Proposals Monograph (PPM), Report of the Hearing (ROH) and Final Action Agenda (FAA):

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- 2) PLEASE TYPE OR PRINT CLEARLY: FORMS WILL BE RETURNED if they contain unreadable information.

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- 3) *Signature: ☒ Signature on File (see over)

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- 4) Cost Impact: Indicate if this Proposal: ☐ will ☐ will not increase the cost of construction.

- 5) Indicate appropriate International Code(s) associated with this Public Proposal – Please use Acronym:

IBC

If you have also submitted a separate coordination change to another I-Code, please indicate the code: _____
(See back of this form for list of names and acronyms for the International Codes).

- 6) Revision to: ☒ Section 504.2 ☐ Table ☐ Figure

- 7) PROPOSAL Please check appropriate box:

☒ Revise as follows: ☐ Add new text as follows ☐ Delete and substitute as follows: ☐ Delete without Substitution(s):

Show the proposed NEW, REVISED or DELETED TEXT in legislative format: ~~Line through text to be deleted.~~ Underline text to be added.

504.2 Automatic sprinkler system increase. Where a building is equipped throughout with an approved automatic sprinkler system in accordance with Section 903.3.1.1, the value specified in Table 503 for ~~maximum height is increased by 20 feet (6096 m)~~ and the maximum number of stories is increased by one. These increases are permitted in addition to the area increase in accordance with Sections 506.2 and 506.3. For Group R buildings equipped throughout with an approved automatic sprinkler system in accordance with Section 903.3.1.2, the value specified in Table 503 for maximum height is increased by 20 feet (6096 m) and the maximum number of stories is increased by one, but shall not exceed 60 feet (18 288 m) or four stories, respectively.

Exceptions:

1. Fire areas with an occupancy in Group I-2 of Type IIB, IIIA, IV or VA construction.
2. Fire areas with an occupancy in Group H-1, H-2, H-3, or H-5.
3. Fire-resistance rating substitution in accordance with Table 601, Note d.
4. Buildings containing atriums required to comply with Section 404.
5. This increase shall not be permitted where the area increase in accordance with Section 506.3 is used.

☐ PROPOSAL Continued (Attach additional sheets as necessary)

- 8) SUPPORTING INFORMATION (State purpose and reason, and provide substantiation to support proposed change):
These revisions make this section consistent with Section 506 of the 1997 UBC. First, the UBC does not allow modifications to be made to the allowable heights of buildings of a Group R occupancy where a

residential sprinkler system (NFPA 13 R/UBC Standard 9-3) is provided. Section 904.1.3 of the 1997 UBC states: “When residential sprinkler systems as set forth in UBC Standard 9-3 are provided, exceptions to, or reductions in, code requirements based on the installation of an automatic fire-extinguishing system are not allowed.” However, IBC Section 504.2 allows a residential sprinkler system designed per NFPA 13R (Section 903.3.1.2) to be used to increase the allowable height of the building. Second, this amendment eliminates the allowable use of “double dipping” where a height increase for automatic sprinkler system protection is allowed in addition to an area increase. Presently, the 1997 UBC does not allow this practice and that is the purpose for deleting the last sentence of this section, as well as for adding the new Exception #5. See Item 2 of UBC Section 506. Third, Exception #1 is revised to recognize that Types IIIB and VB construction are “NP” and to correlate with the UBC for Type II construction. And, finally, Exception #4 is added to correlate with Item 4 of Section 506 of the UBC which does not allow the height increase for an automatic sprinkler system if the building is regulated as an atrium which also requires that the building be sprinklered throughout with an automatic sprinkler system. Again, this is to prevent “double dipping” with the use of an automatic sprinkler system.

This proposed amendment is really an issue of “putting too many eggs in one basket” by allowing too many trade-offs for automatic sprinkler systems. We do not quarrel with the value of automatic sprinkler systems. It’s just that we don’t believe they are the “panacea” for all fire safety concerns. Although they are very reliable, they are not totally infallible and, as such, trade-offs allowed for automatic sprinkler systems should consider the possibility that the sprinkler system may not perform as intended. It is interesting to note that the IBC already recognizes that for certain conditions involving Group I-2 occupancies and for all Group H occupancies as indicated in Exceptions #1 and #2 to Section 504.2, there is a need not to allow for additional uses of automatic sprinkler system trade-offs. Those approaches are consistent with the 1997 UBC Section 506 as indicated in Items 1 and 5. Thus, this proposed amendment simply incorporates the additional restrictions on “double dipping” where automatic sprinkler systems are involved to be totally consistent with the UBC.

It should also be noted that the height increase allowing a 20 ft. increase in the total building height has been deleted by this proposed amendment. Again, the UBC does not allow for such an increase of building height but only an increase in the story height provided the building still meets the overall height limits for the type of construction.

Regarding the residential sprinkler system trade-off allowing the additional increase in story height, as well as total building height by 20 ft., not to exceed a total height of 4 stories, we have serious concerns about allowing a residential sprinkler system to be used for a structural fire resistive trade-off. In effect,

this would allow a Group R-1 hotel or Group R-2 apartment house to be constructed of Type VB (UBC Type V-N) construction to a height of 3 stories and 60 ft. It would also allow those occupancies to be constructed to a maximum height of 4 stories and 60 ft. in Type VA (UBC Type V-One hour) construction.

In our opinion, this is unsupportable since the NFPA 13R automatic sprinkler system does not require the attic to be protected with automatic sprinklers. Thus, in effect, the present allowance in Section 504.2 would permit an unprotected attic at an increased height which is even more inaccessible to the fire department than what the present code allows in an unsprinklered building simply because the occupied portions of the building are sprinklered. This would pose an even greater fire fighting challenge for the responding fire department should a fire occur in a concealed space that spread into the attic or started in the attic itself.



SUPPORTING INFORMATION *Continued* (Attach additional sheets as necessary)